

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF  
THE KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX REFUND  
SCHEME LITIGATION

This document relates to 1:18-CV-05053-LAK.

MASTER DOCKET

Case No. 1-18-MD-02865-LAK

**DECLARATION OF KARI PARKS**

I, KARI PARKS, declare as follows:

1. I am an associate of the firm Gusrae Kaplan Nusbaum LLP and am counsel for The Goldstein Law Group PC 401(K) Profit Sharing Plan and Sheldon Goldstein, Defendants, Counterclaim–Plaintiffs, and Third-Party Plaintiffs in the above-captioned matter (the “Goldstein Defendants”).
  
2. On Monday, April 22, 2019, I made four attempts to electronically file the Goldstein Defendants’ Amended Answer, Affirmative Defenses, and Counterclaims Against Skatteforvaltningen and Third-Party Complaint Against ED&F Man Capital Markets, Ltd. (the “Amended Answer”): first using the Firefox internet browser, then using the Internet Explorer browser.

3. On each attempt, ECF allowed me to complete the filing process through the penultimate step, upon which it froze and eventually displayed the message, “An Internal Error has occurred the error code is 74.”

4. After my first failed filing attempt, I spoke to an individual who answered the phone line for the SDNY ECF Help Desk, who advised that I try using a different internet browser.

5. However, each of my subsequent three attempts with the Internet Explorer browser resulted in the same error message.

I, KARI PARKS, hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: April 23, 2019  
New York, New York

/s/ Kari Parks